

REMARKS

Applicant respectfully requests reconsideration of the present U.S. Patent application. Claims 6 and 18 stand objected to under 35 U.S.C. § 112. Claims 1-10 and 13-19 stand rejected under 35 U.S.C. § 102. Claims 11 and 12 stand rejected under 35 U.S.C. § 103. Claims 1, 6-13, 17 and 18 have been amended. Claims 20 and 21 have been added. Therefore, by this amendment, claims 1-21 are pending.

Drawing Objections

The drawings, specifically Figs. 1-4, were objected to because they included various reference signs not mentioned in the description. The description has been amended to include the following reference signs: 100 in Fig. 1; 200 in Fig. 2; 335 and 350 in Fig. 3; and 400 in Fig. 4. In addition, Examiner is directed to page 9 of the description, which contains reference sign 325 that Examiner believed was not mentioned in the description. Therefore, Applicant requests that the objection to the drawings be withdrawn.

Claim Objections

Claim 6 was objected to because of the phrase "the device configuration," specifically because prior use of "the configuration" in the claim was not explicitly associated solely with a device. In addition, claim 18 was objected to because the phrase "the graphical component associated with the configuration command" did not explicitly state which configuration command the graphical component was associated. Claims 6

and 18 have been amended to address Examiner's objections. Therefore, Applicant submits that the objections to claims 6 and 18 have been overcome.

Claim Rejections - 35 U.S.C. § 102

Rejection of Claims 1-5 and 13-19 based on Chari

Claims 1-10 and 13-19 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,046,742 issued to Chari (*Chari*). For at least the reasons set forth below, Applicant submits that claims 1-10 and 13-19 are not anticipated by *Chari*.

Claim 1 recites the following:

associating the graphical component with a device configuration command;  
linking the associated graphical component with a console user interface (CUI)  
and a configuration kernel (CK), the CUI and CK having code to configure a remote  
device according to the device configuration command; and  
building a graphical user interface (GUI) from the linked graphical component,  
the CUI and the CK, to reflect a state of the CK as communicated by the CUI.

Claim 13 is drawn to a machine-readable medium storing sequences of instructions, and recites similar limitations. A proper rejection under 35 U.S.C. § 102 requires that a single prior art reference teach each and every element of the rejected claim. See MPEP § 2131.

*Chari* discloses a plurality of forms that enable the modification of one or more operational parameters for components in a computer network. See Abstract. A user can change the value of a Management Information Base (MIB) variable by typing over a current value in a dialog box. See col. 14, lines 49-55. A MIB Manager Module modifies the MIB variable by retrieving MIB data from a server, or calling other modules to retrieve the data. See col. 8, lines 16-24; col. 12, lines 23-31; col. 13, lines 14-15; col.

col. 14, lines 64-66. *Chari* does not disclose building a graphical user interface (GUI) from a linked graphical component, a CUI and a CK, to reflect the state of the CK as communicated by the CUI. Thus, *Chari* fails to teach all of the limitations of claims 1 and 13. Consequently, *Chari* does not anticipate the invention in claims 1 and 13 for at least the reasons set forth above. Applicant therefore respectfully requests that the Examiner withdraw the rejection of claims 1 and 13 under 35 U.S.C. § 102.

Claims 2-5 depend from claim 1. Claims 14-19 depend from claim 13. Because dependent claims include the limitations of the claims from which they depend, Applicant submits that claims 2-5 and 14-19 are not anticipated by *Chari* for at least the reasons set forth above.

Claim 17 recites the following:

identifying a registered command that matches a configuration command, wherein the configuration command describes a state of a configuration kernel for the networked device, and the registered command identifies a graphical component associated with the configuration command; ...

As demonstrated above in the explanation of the information disclosed in *Chari*, *Chari* does not disclose identifying a registered command that matches a configuration command, wherein the configuration command describes a state of a configuration kernel for the networked device, and the registered command identifies a graphical component associated with the configuration command. Thus, *Chari* fails to teach all of the limitations of claim 17. Consequently, *Chari* does not anticipate the invention in claim 17 for at least the reasons set forth above. Applicant therefore respectfully requests that the Examiner withdraw the rejection of claim 17 under 35 U.S.C. § 102.

Claims 18-19 depend from claim 17. Because dependent claims include the limitations of the claims from which they depend, Applicant submits that claims 18-19 are not anticipated by *Chari* for at least the reasons set forth above.

Rejection of Claims 6-10 based on *Takimoto*

Claims 6-10 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,041,350 issued to Takimoto (*Takimoto*). For at least the reasons set forth below, Applicant submits that claims 6-10 are not anticipated by *Takimoto*.

Claim 6 recites the following:

a communications mechanism to communicate the received update from the GUI to the CUI, communicate the updated configuration from the CUI to the CK, and communicate the updated configuration from the CK to the CUI and from the CUI to the a GUI, in order to reflect a state of the CK as communicated by the CUI.

*Takimoto* discloses a network management system, which includes a management information database to store managed objects, a simulated behavior execution controller (SBEC) to simulate behavior of a managed object, and a transaction controller to cause modified content that is based on the simulated behavior to be reflected in the management information database. See col. 4, lines 22-50; col. 5, lines 14-40. *Takimoto* does not disclose a communications mechanism to communicate a received update from a GUI to a CUI, communicate the updated configuration from the CUI to a CK, and communicate the updated configuration from the CK to the CUI and from the CUI to the a GUI, in order to reflect the state of the CK as communicated by the CUI. Thus, *Takimoto* fails to teach all of the limitations of claim 6. Consequently, *Takimoto* does not anticipate the invention in claim 6 for at least the reasons set forth above. Applicant

therefore respectfully requests that the Examiner withdraw the rejection of claim 6 under 35 U.S.C. § 102.

Claims 7-10 depend from claim 6. Because dependent claims include the limitations of the claims from which they depend, Applicant submits that claims 7-10 are not anticipated by *Takimoto* for at least the reasons set forth above.

Claim Rejections - 35 U.S.C. § 103

Rejection of Claims 11 and 12 based on *Takimoto* and the Prior Art

Claims 11 and 12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Takimoto* in view of admitted prior art. For at least the reasons set forth below, Applicant submits that claims 11 and 12 are not rendered obvious by *Takimoto* in view of the prior art.

A proper rejection under 35 U.S.C. § 103 requires that a prior art reference, or references when combined, must teach or suggest all of the claim limitations of the rejected claim. See MPEP § 2143. As explained above, *Takimoto* fails to disclose a communications mechanism to communicate a received update from a GUI to a CUI, communicate the updated configuration from the CUI to a CK, and communicate the updated configuration from the CK to the CUI and from the CUI to the a GUI, in order to reflect the state of the CK as communicated by the CUI.

The prior art fails to disclose a "console user interface" in accordance with the definition and use of that term as set forth in the specification. Applicant respectfully points out to the Examiner "[t]he specification acts as a dictionary when it expressly defines terms used in the claims or when it defines terms by implication. . . . Thus, the

specification is always highly relevant to the claim construction analysis. Usually it is dispositive; it is *the single best guide to the meaning of a disputed term.*" *Vitronics Corp. v. Conceptronic Inc.* 39 USPQ2d 1573, 1577. Applicant contends, therefore, that the Examiner is required to interpret the claims of the present invention in accordance with the definition of the term "console user interface" as set forth in the specification. For example, page 5, lines 18-19 of the specification state "the GUI 210 and CUI 220 form a self-contained application, with the CUI 220 running under the GUI 210," and lines 20-22 go on to state that "[s]ince the CUI 220 is not running on an actual remote device, as in the prior art device management systems, it is referred to as a virtual console . . . ."

Accordingly, because the prior art fails to disclose a CUI as defined and used in the specification, the prior art fails to disclose a CUI as recited in claim 6, e.g., a communications mechanism to communicate a received update from a GUI to a CUI, communicate the updated configuration from the CUI to a CK, and communicate the updated configuration from the CK to the CUI and from the CUI to the a GUI, in order to reflect the state of the CK as communicated by the CUI, as recited in claim 6. Thus, the prior art fails to cure the deficiencies of *Takimoto*. Consequently, *Takimoto* in view of the prior art fails to teach or suggest all of the limitations of claim 6. Claims 11 and 12 depend from claim 6. Because dependent claims include the limitations of the claims from which they depend, Applicant submits that claims 11 and 12 are not rendered obvious by *Takimoto* in view of the prior art for at least the reasons set forth above. Applicant therefore respectfully requests that the Examiner withdraw the rejection of claims 11 and 12 under 35 U.S.C. § 103.

CONCLUSION

For at least the foregoing reasons, Applicant submits that the rejections have been overcome. Therefore, claims 1-19 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,

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